

S/N 09/315,334

PATENTRemarks

The applicant has amended claims 1, 5, 6, 14, 19, and 29, and has cancelled claims 4 and 24-28, without prejudice. Claims 1, 5-23, and 29-33 are currently pending. In light of the foregoing amendments and the following remarks, the applicant respectfully request allowance of the pending claims.

A. Interview Summary

Applicant appreciates the courtesy extended by the Examiner to applicant's representative, Robert A. Kalinsky, during the telephonic interview on May 13, 2005. During the interview, the Mathews article and claim 1 were discussed. No agreement regarding the allowability of the claims was reached.

B. Rejection of Claims 1, 4, 19, 23-25

Claims 1, 4, 19, and 23-25 stand rejected as being unpatentable over Mathews in view of Harris et al. The applicant respectfully traverses this rejection, and the correctness of the rejection is not conceded. Reconsideration is requested for at least the following reasons.

Preliminarily, applicant maintains that there is no motivation to combine the disclosure of Mathews with that of Harris. The nature of problems being solved in Mathews and Harris differ, and one skilled in the art would not be motivated to combine the two references. In addition, there is no suggestion in either reference to motivate such a combination. Applicant therefore respectfully reserves the right to traverse such a combination in future prosecution.

Claim 1 recites a computer-readable medium having computer-executable instructions for performing a method of using expressions to establish a relationship between properties in code executable by a browser, including declaring value of a first property as a scalar value, wherein the first property is a width of a window of the browser. Claim 1 further recites declaring the value of a second property as an expression, wherein the second property is a function of the first property, and wherein the expression represents an element in the window of the browser.

One non-limiting example of such a method is provided in the examples at pages 11 and 12 of the present application. In the first example described therein, "innerHTML" is the identifier that names a variable or dynamic property. The string "document.body.clientWidth" is

S/N 09/315,334

PATENT

a dependency of the expression. The following example expression declares "innerHTML" as a function of "document.body.clientWidth":

```
"MyElement.setExpression("innerHTML", "document.body.clientWidth")
```

Accordingly, a change in the value of "document.body.clientWidth" will affect a change in the value of "innerHTML." For example, a change in the width of the browser window ("document.body.clientWidth") will result in a change in the size of the font displayed in the window ("innerHTML"). In this manner, changes in window size of a browser are used to change elements in the window.

Neither Mathews nor Harris discloses or suggests the method recited by claim 1. For example, Mathews discloses vector markup language ("VML") that can be used to change the size and form of a shape. Mathews fails, however, to disclose or suggest that VML can be used to change the size of an element in a window of a browser based on a change in the width of the window of the browser. Harris is directed solely to a spreadsheet having a table of cells for calculating and displaying numbers.

In sharp contrast, neither Mathews nor Harris, alone or in combination, discloses or suggests declaring a value of a first property as a scalar value, wherein the first property is a width of a window of the browser, and declaring a value of a second property as an expression, wherein the second property is a function of the first property, and wherein the expression represents an element in the window of the browser, as recited by claim 1. Reconsideration and allowance of claim 1 are therefore respectfully requested.

Claim 19 recites a computer including a memory storing a browser for execution by a processor. Claim 19 recites that the browser includes code programmed to analyze the HTML code to identify scalar properties and expressions, at least one of the expressions defining the value of a dynamic property and being a function of at least one scalar property, wherein the scalar property is a width of a window of the browser, and wherein the expression represents an element in the window of the browser. Claim 19 should therefore be allowable for at least reasons similar to those provided above with respect to claim 1. Reconsideration and allowance of claim 19, as claim 23 that depends therefrom, are respectfully requested.

S/N 09/315,334

PATENT**C. Rejection of Claims 5-18, 20-22, and 26-33**

Claims 5-18, 20-22, and 26-33 stand rejected as being unpatentable over Mathews in view of Harris, and further in view of Garman. The applicant respectfully traverses this rejection, and the correctness of the rejection is not conceded. Reconsideration is respectfully requested for at least the following reasons.

Claim 5 is directed to a computer-readable medium having stored thereon a data structure. Claim 5 recites that the data structure includes at least one leaf node stored in memory, each leaf node containing a scalar property, wherein the scalar property is a width of a window of a browser. Claim 5 further recites at least one expression node stored in memory, the at least one expression node containing an expression written in a markup language and defining a dynamic property, the expression being a function of the scalar property, the expression for programming formatting instructions, wherein the expression represents an element in the window of the browser. Garman does not remedy the shortcomings of Mathews and Harris noted above. Claim 5 should therefore be allowable for at least reasons similar to those provided above with respect to claim 1. Reconsideration and allowance of claim 5, as claims 6-13 that depend therefrom, are respectfully requested.

Claim 14 is directed to a method including declaring a value of one or more scalar properties, wherein the value of the scalar properties is not a function of another property, and wherein at least one of the scalar properties is a width of a window of the browser, and creating one or more expressions declaring a value of a dynamic property, the dynamic property being a function of another property, the expression for programming formatting instructions, and wherein the expression represents an element in the window of the browser. Garman does not remedy the shortcomings of Mathews and Harris noted above. Claim 13 should therefore be allowable for at least reasons similar to those provided above with respect to claim 1. Reconsideration and allowance of claim 13, as claims 14-18 that depend therefrom, are respectfully requested.

Claims 20-22 all depend from claim 19. Garman does not remedy the shortcomings of Mathews and Harris noted above. Claims 20-22 are therefore allowable for at least the same reasons as those provided above with respect to claim 19. Reconsideration and allowance are respectfully requested.

S/N 09/315,334

PATENT

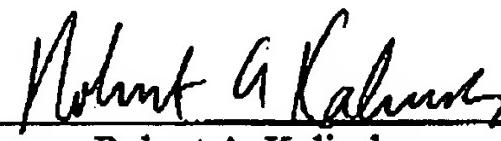
Claim 29 is directed to a computer data signal embodied in a carrier wave readable by a computing system and encoding a computer program of instructions for executing a computer process. Claim 29 recites providing a value of one or more scalar properties, wherein the value of the scalar properties is not a function of another property, and wherein at least one of the scalar properties is a width of a window of the browser, and creating one or more expressions declaring a value of a dynamic property, each dynamic property being a function of another property, the expression for programming formatting instructions, and wherein the expression represents an element in the window of the browser. Garman does not remedy the shortcomings of Mathews and Harris noted above. Claim 29 should therefore be allowable for at least reasons similar to those provided above with respect to claim 1. Reconsideration and allowance of claim 29, as claims 30-33 that depend therefrom, are respectfully requested.

Conclusion

In light of the foregoing amendments and remarks, the applicant respectfully submits that the claims are in condition for allowance and requests advancement of the application toward issuance. The applicant also notes that there may be other arguments in support of patentability of the claims and reserves the right to raise any such argument in the future. Please call the undersigned attorney if there are any questions.

Respectfully submitted,  
MERCHANT & GOULD P.C.  
P.O. Box 2903  
Minneapolis, Minnesota 55402-0903  
(612) 332-5300

Date: July 7, 2005

  
Name: Robert A. Kalinsky  
Reg. No.: 50,471  
RAK:pll